

IN THE DISTRICT/SUPERIOR COURT FOR THE STATE OF ALASKA
AT ANCHORAGE

Michael Maze

Plaintiff(s),

vs.

21st Century North America

Insurance Company

Defendant(s).

CASE NO. 3AN-15-11369 C1

SUMMONS AND
NOTICE TO BOTH PARTIES
OF JUDICIAL ASSIGNMENT

To Defendant: 21st Century North America Insurance Company

You are hereby summoned and required to file with the court a written answer to the complaint which accompanies this summons. Your answer must be filed with the court at 825 W. 4th Ave., Anchorage, Alaska 99501 within 20 days* after the day you receive this summons. In addition, a copy of your answer must be sent to the plaintiff's attorney or plaintiff (if unrepresented)

Pentlarge Law Group, whose address is: 1400 W. Benson
Suite 550, Anchorage, AK 99503

If you fail to file your answer within the required time, a default judgment may be entered against you for the relief demanded in the complaint.

If you are not represented by an attorney, you must inform the court and all other parties in this case, in writing, of your current mailing address and any future changes to your mailing address and telephone number. You may use court form *Notice of Change of Address / Telephone Number* (TF-955), available at the clerk's office or on the court system's website at www.courts.alaska.gov/forms.htm, to inform the court. - OR - If you have an attorney, the attorney must comply with Alaska R. Civ. P. 5(i).

NOTICE OF JUDICIAL ASSIGNMENT

TO: Plaintiff and Defendant

You are hereby given notice that:

☒ This case has been assigned to Superior Court Judge Easter
and to a magistrate judge.

☐ This case has been assigned to District Court Judge _____.

CLERK OF COURT

12/17/15
Date



By: Casquevan
Deputy Clerk

I certify that on 12/17/15 a copy of this Summons was ☐ mailed ☒ given to
☐ plaintiff ☒ plaintiff's counsel along with a copy of the
☐ Domestic Relations Procedural Order ☐ Civil Pre-Trial Order
to serve on the defendant with the summons.

Deputy Clerk Casquevan

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* The State or a state officer or agency named as a defendant has 40 days to file its answer. If you have been served with this summons outside the United States, you also have 40 days to file your answer.

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
THIRD JUDICIAL DISTRICT AT ANCHORAGE

MICHAEL MAZE

Plaintiff,

v.

21st CENTURY NORTH AMERICA
INSURANCE COMPANY,

Defendant.

FILED
STATE OF ALASKA
THIRD DISTRICT
2015 DEC 17 PM 2:56
CLERK, JUDICIAL COURTS
BY DEPUTY CLERK

Case No.: 3AN-15- 11369 CI

COMPLAINT

Plaintiff, Michael Maze, by and through his attorneys, PENTLARGE LAW GROUP, and for his complaint against the defendant, states and alleges as follows:

1. Plaintiff is a resident of the state of Alaska and has been at all times pertinent hereto.
2. That at all times material hereto, defendant 21st Century North America Insurance Company (hereinafter referred to as "21st Century") was and is an insurance company doing business in Anchorage, Alaska, Third Judicial District.
3. The defendant is liable for the actions and/or failures to act of its employees and/or adjusters and/or agents pursuant to respondeat superior and/or vicarious liability and/or agency.
4. The plaintiff was insured by defendant on January 16, 2013 for auto medical payments coverage in the amount of \$100,000.00.
5. Under the terms of the insurance coverage the defendant sold the plaintiff, 21st Century agreed to pay the medical payment fee for medically necessary and appropriate medical

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services sustained by plaintiff in an auto accident ; and incurred for services rendered within eighteen (18) months of the auto accident.

6. The plaintiff was injured when another vehicle failed to stop behind plaintiff and struck the driver's side of plaintiff's vehicle.

7. The plaintiff incurred medical expenses resulting from the auto accident on January 16, 2013.

8. The plaintiff properly submitted a first-party medical payments claim to the defendant.

9. The defendant used a biased computer program to review medical bills of Plaintiff.

10. The defendant requested that insurance doctors review medical recs and write reports to deny coverage.

11. The defendant unreasonably disregarded relevant information regarding plaintiff's medical payments claim.

12. The defendant intentionally and unreasonably investigated plaintiff' med payments claim.

13. When handling a claim, the defendant was prohibited from placing its own interest ahead of its policyholder, Michael Maze.

14. The defendant was obligated to fairly and objectively investigate and evaluate the plaintiff's medical payments claim.

15. The defendant unreasonably denied portions of the plaintiff's medical payments claim.

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16. The defendant's denials were based on vague and/or unreasonable and/or arbitrary and/or unconscionable exclusions.

17. The defendant's denials were based on biased and/or unreasonable adjustment of the plaintiff's claim.

18. The defendant's negligence and/or reckless and/or intentional adjustment was a substantial factor causing harm to the plaintiff for which the defendant is liable.

19. The defendant is liable for breach of contract.

20. The defendant is liable for breach of the covenant of good faith and fair dealing which was a substantial factor causing harm to the plaintiff.

21. The defendant's conduct evidenced reckless indifference to the interests of plaintiff and/or was outrageous.

23. The defendant is liable for punitive and/or exemplary damages.


24. The defendant is liable for payment of past medical expenses, emotional distress, inconvenience, breach of contract and other non-pecuniary damages to be more fully set forth at trial, caused by the defendant all in an amount exceeding \$100,000.00 the exact amount to be set by the trier of fact.

WHEREFORE, having stated his Complaint, plaintiff prays for judgment against the defendant as follows:

1. For general and special damages for plaintiff in an amount in excess of \$100,000.00 the exact amount to be proven at trial;
2. For pre-judgment and post-judgment interest at the maximum rate allowable by law;
3. For plaintiff's costs and attorney's fees incurred in pursuing this action;
4. For punitive damages; and
5. For such other and further relief as the court may deem just and equitable in the premises.

DATED this 16 day of December, 2015 at Anchorage, Alaska.

PENTLARGE LAW GROUP
Attorneys for Plaintiff


Robert J. Jurasek
Alaska Bar No.: 9111071

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